

# Exhibit J

**IN THE GEORGIA STATE-WIDE BUSINESS COURT  
STATE OF GEORGIA**

WELLS FARGO BANK, N.A., WELLS FARGO  
DELAWARE TRUST CO., N.A.,  
COMPUTERSHARE TRUST CO., N.A. and  
COMPUTERSHARE DELAWARE TRUST CO.

Plaintiffs,

- against -

BRUCE ACHENBACH, NANCY BELSER,  
ANDREW COSTANZA, ANDREW DARROW,  
DAVID DARROW, JONATHAN DARROW, JAY  
GRIMM, JR., ROBERT KRAKOVITZ, MOSHE  
MALKA, LEON MALNIK, BARRY SEPTIMUS,  
and PHYLLIS SIFEN

Defendants.

**CIVIL CASE NO.**

**VERIFIED APPLICATION FOR *PRO HAC VICE* ADMISSION**

Pursuant to Georgia Business Court Rule 4-4, I, Jonathan P. Hersey (Applicant), hereby applies to this Honorable Court for admission to practice in the above-styled case *pro hac vice*. In support of this application, Applicant states as follows:

1. I reside at:  
  
13092 Tamarisk Drive  
Santa Ana, CA 92705
2. My business address is:  
  
K&L Gates LLP

1 Park Plaza, 12th Floor  
Irvine, CA 92614  
Phone: 949-623-3570  
Email: jonathan.hersey@klgates.com

3. I have been retained to represent the following clients:

Wells Fargo Bank, N.A.  
420 Montgomery Street  
San Francisco, CA 94104

Wells Fargo Delaware Trust Company, N.A.  
919 Market Street, Suite 1600  
Wilmington, DE 19801

4. I am a member in good standing of the following jurisdictions:

Jurisdiction: California  
Date admitted: June 9, 1997  
Current Status: Active  
Bar/Registration No.: 189240

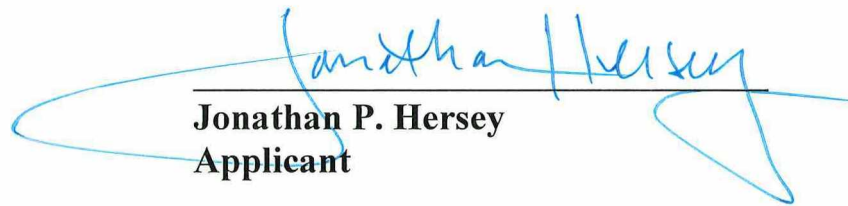
5. I have never been a member of the State Bar of Georgia.
6. I have never been denied *pro hac vice* admission in Georgia.
7. I have never had *pro hac vice* admission revoked in Georgia.
8. I have never been sanctioned or formally disciplined by a court in Georgia.
9. I have never been the subject of any formal disciplinary proceedings.
10. I have never been formally held in contempt, or otherwise sanctioned by a court in a written order, for disobedience to its rules or orders.
11. In the past two years I have not filed for *pro hac vice* admission in Georgia.
12. I have reviewed and am familiar with the Georgia Rules of Professional Conduct and all court rules relevant to practice before the court in which I am seeking admission.

13. My local sponsor is:

Terry R. Weiss  
Bar Number: 746495  
Duane Morris LLP  
1075 Peachtree St. NE, Suite 1700  
Atlanta, Georgia 30309  
Phone: 404-253-6909  
Email: TRWeiss@duanemorris.com

I, Jonathan P. Hersey, applicant in the foregoing Verified Application for *Pro Hac Vice* Admission, hereby verify the facts contained herein are true and accurate to the best of my knowledge.

This 30<sup>th</sup> day of November, 2023.

  
**Jonathan P. Hersey**  
**Applicant**

Sworn before me this \_\_\_\_\_ day of November, 2023

\_\_\_\_\_  
**Notary Public**

My commission expires \_\_\_\_\_

- Please  
see  
attached.  
-SF

**CERTIFICATE OF SERVICE**

I am initiating this litigation and do not know who opposing counsel(s) is at this time. I will serve copy of the foregoing Verified Application for *Pro Hac Vice* Admission on opposing counsel as soon as possible and will notify the Office of the General Counsel of the same.

/s/ Terry R. Weiss

Terry R. Weiss

Bar Number: 746495

**Duane Morris LLP**

1075 Peachtree St. NE, Suite 1700

Atlanta, Georgia 30309

Phone: 404-253-6912

Email: TRWeiss@duanemorris.com

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

GOVERNMENT CODE § 8202

- ☒ See Attached Document (Notary to cross out lines 1-6 below)  
☐ See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

1 \_\_\_\_\_  
 2 \_\_\_\_\_  
 3 \_\_\_\_\_  
 4 \_\_\_\_\_  
 5 \_\_\_\_\_  
 6 \_\_\_\_\_

Signature of Document Signer No. 1      Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

Subscribed and sworn to (or affirmed) before me

on this 30 day of November, 2023  
 by      Date      Month      Year

(1) Jonathan Hersey  
 (and (2) \_\_\_\_\_),

Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence  
 to be the person(s) who appeared before me.

Signature Sofia Farooquee  
 Signature of Notary Public



Seal  
 Place Notary Seal Above

**OPTIONAL**

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: Verified Application for Pro Hac Vice Application - Jonathan P. Hersey Document Date: 11/30/2023  
 Number of Pages: 4 Signer(s) Other Than Named Above: \_\_\_\_\_

**IN THE GEORGIA STATE-WIDE BUSINESS COURT  
STATE OF GEORGIA**

WELLS FARGO BANK, N.A., WELLS FARGO  
DELAWARE TRUST CO., N.A.,  
COMPUTERSHARE TRUST CO., N.A. and  
COMPUTERSHARE DELAWARE TRUST CO.

Plaintiffs,

- against -

BRUCE ACHENBACH, NANCY BELSER,  
ANDREW COSTANZA, ANDREW DARROW,  
DAVID DARROW, JONATHAN DARROW, JAY  
GRIMM, JR., ROBERT KRAKOVITZ, MOSHE  
MALKA, LEON MALNIK, BARRY SEPTIMUS,  
and PHYLLIS SIFEN

Defendants.

**CIVIL CASE NO.**

**VERIFIED APPLICATION FOR *PRO HAC VICE* ADMISSION**

Pursuant to Georgia Business Court Rule 4-4, I, Kennedy M. Myers (Applicant), hereby applies to this Honorable Court for admission to practice in the above-styled case *pro hac vice*. In support of this application, Applicant states as follows:

1. I reside at:  
  
32393 Old Sage Drive  
San Juan Capistrano, CA 92675
2. My business address is:  
  
K&L Gates LLP

1 Park Plaza, 12th Floor  
Irvine, CA 92614  
Phone: 949-623-3614  
Email: kennedy.loenhorst@klgates.com

3. I have been retained to represent the following clients:

Wells Fargo Bank, N.A.  
420 Montgomery Street  
San Francisco, CA 94104

Wells Fargo Delaware Trust Company, N.A.  
919 Market Street, Suite 1600  
Wilmington, DE 19801

4. I am a member in good standing of the following jurisdictions:

Jurisdiction: California  
Date admitted: December 9, 2021  
Current Status: Active  
Bar/Registration No.: 343152

5. I have never been a member of the State Bar of Georgia.
6. I have never been denied *pro hac vice* admission in Georgia.
7. I have never had *pro hac vice* admission revoked in Georgia.
8. I have never been sanctioned or formally disciplined by a court in Georgia.
9. I have never been the subject of any formal disciplinary proceedings.
10. I have never been formally held in contempt, or otherwise sanctioned by a court in a written order, for disobedience to its rules or orders.
11. In the past two years I have not filed for *pro hac vice* admission in Georgia.
12. I have reviewed and am familiar with the Georgia Rules of Professional Conduct and all court rules relevant to practice before the court in which I am seeking admission.




13. My local sponsor is:

Terry R. Weiss  
Bar Number: 746495  
Duane Morris LLP  
1075 Peachtree St. NE, Suite 1700  
Atlanta, Georgia 30309  
Phone: 404-253-6909  
Email: TRWeiss@duanemorris.com

I, Kennedy M. Myers, applicant in the foregoing Verified Application for *Pro Hac Vice* Admission, hereby verify the facts contained herein are true and accurate to the best of my knowledge.

This 30 day of November, 2023.

  
\_\_\_\_\_  
**Kennedy M. Myers**  
**Applicant**

Sworn before me this \_\_\_\_\_ day of November, 2023

\_\_\_\_\_  
**Notary Public**

My commission expires \_\_\_\_\_

Please  
see  
attached.  
-SF

**CERTIFICATE OF SERVICE**

I am initiating this litigation and do not know who opposing counsel(s) is at this time. I will serve copy of the foregoing Verified Application for *Pro Hac Vice* Admission on opposing counsel as soon as possible and will notify the Office of the General Counsel of the same.

/s/ Terry R. Weiss

Terry R. Weiss

Bar Number: 746495

**Duane Morris LLP**

1075 Peachtree St. NE, Suite 1700

Atlanta, Georgia 30309

Phone: 404-253-6912

Email: TRWeiss@duanemorris.com

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

GOVERNMENT CODE § 8202

- ☒ See Attached Document (Notary to cross out lines 1-6 below)  
☐ See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

1 \_\_\_\_\_  
 2 \_\_\_\_\_  
 3 \_\_\_\_\_  
 4 \_\_\_\_\_  
 5 \_\_\_\_\_  
 6 \_\_\_\_\_

Signature of Document Signer No. 1      Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

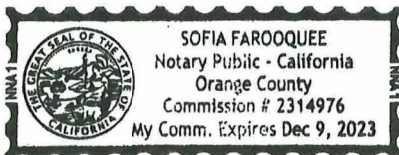
Subscribed and sworn to (or affirmed) before me

on this 30 day of November, 2023,  
 by      Date      Month      Year

(1) Kennedy Myers(and (2) \_\_\_\_\_),  
 Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence  
 to be the person(s) who appeared before me.

Signature Sofia Farooquee  
 Signature of Notary Public



Seal  
 Place Notary Seal Above

**OPTIONAL**

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: Verified Application For Pro Hac Vice - Kennedy M. Myers Document Date: 11/30/2023  
 Number of Pages: 4 Signer(s) Other Than Named Above: \_\_\_\_\_

**IN THE GEORGIA STATE-WIDE BUSINESS COURT**

---

WELLS FARGO BANK, N.A. and  
WELLS FARGO DELAWARE TRUST  
COMPANY, N.A.,

Plaintiffs,

v.

BRUCE ACHENBACH, NANCY  
BELSER, ANDREW COSTANZA,  
ANDREW DARROW, DEAN FLOCK,  
JAY GRIMM, JR., ROBERT KRAKOVITZ,  
MOSHE MALKA, LEON MALNIK, BARRY  
SEPTIMUS, and PHYLLIS SIFEN,

Defendants.

Case No. 23-GSBC-0013

---

**ORDER GRANTING VERIFIED APPLICATION FOR  
PRO HAC VICE ADMISSION OF KENNEDY M. MYERS**

---

The above-styled action is before the Court on the Verified Application for Pro Hac Vice Admission of Kennedy M. Myers (the “Application”), wherein Ms. Myers seeks admission pro hac vice to participate in this litigation as counsel for Plaintiffs Wells Fargo Bank, N.A., and Wells Fargo Delaware Trust Company, N.A. (collectively, “Plaintiffs”). The averments in the foregoing Application satisfy

the requirements of Business Court Rule 4-4. Accordingly, the Application is **GRANTED**, and it is hereby **ORDERED** that Kennedy M. Myers is admitted pro hac vice in this matter as counsel for Plaintiffs.

IT IS SO ORDERED this 7th day of December, 2023.



---

HON. WILLIAM "BILL" GRADY HAMRICK, III  
Georgia State-wide Business Court Judge

*Wells Fargo Bank, N.A., et al. v. Achenbach, et al. (23-GSBC-0013)*  
*Order Granting Verified Application for*  
*Pro Hac Vice Admission of Kennedy M. Myers*

*Copies to:*<sup>1</sup>

**Terry R. Weiss**

[trweiss@duanemorris.com](mailto:trweiss@duanemorris.com)

**Catherine G. Lucas**

[klucas@duanemorris.com](mailto:klucas@duanemorris.com)

DUANE MORRIS LLP

1075 Peachtree Street, N.E., Suite 1700

Atlanta, Georgia 30309-3929

Telephone: (404) 253-6912

**Jonathan P. Hersey** (admitted *pro hac vice*)

[jonathan.hersey@klgates.com](mailto:jonathan.hersey@klgates.com)

**Kennedy M. Myers** (admitted *pro hac vice*)

[kennedy.loenhorst@klgates.com](mailto:kennedy.loenhorst@klgates.com)

K&L GATES LLP

1 Park Plaza, Twelfth Floor

Irvine, California 92614

Telephone: (949) 253-0900

*Counsel for Plaintiffs*

*Wells Fargo Bank, N.A., et al. v. Achenbach, et al. (23-GSBC-0013)*

*Order Granting Verified Application for*

*Pro Hac Vice Admission of Kennedy M. Myers*

---

<sup>1</sup> Plaintiffs are directed to serve a copy of this order on the named Defendants (or their counsel if formally represented in connection with this action) in accordance with Georgia law.

**IN THE GEORGIA STATE-WIDE BUSINESS COURT**

---

WELLS FARGO BANK, N.A. and  
WELLS FARGO DELAWARE TRUST  
COMPANY, N.A.,

Plaintiffs,

v.

BRUCE ACHENBACH, NANCY  
BELSER, ANDREW COSTANZA,  
ANDREW DARROW, DEAN FLOCK,  
JAY GRIMM, JR., ROBERT KRAKOVITZ,  
MOSHE MALKA, LEON MALNIK, BARRY  
SEPTIMUS, and PHYLLIS SIFEN,

Defendants.

Case No. 23-GSBC-0013

---

**ORDER GRANTING VERIFIED APPLICATION FOR  
PRO HAC VICE ADMISSION OF JONATHAN P. HERSEY**

---

The above-styled action is before the Court on the Verified Application for Pro Hac Vice Admission of Jonathan P. Hersey (the “Application”), wherein Mr. Hersey seeks admission pro hac vice to participate in this litigation as counsel for Plaintiffs Wells Fargo Bank, N.A., and Wells Fargo Delaware Trust Company, N.A. (collectively, “Plaintiffs”). The averments in the foregoing Application satisfy

the requirements of Business Court Rule 4-4. Accordingly, the Application is **GRANTED**, and it is hereby **ORDERED** that Jonathan P. Hersey is admitted pro hac vice in this matter as counsel for Plaintiffs.

IT IS SO ORDERED this 7th day of December, 2023.



---

HON. WILLIAM “BILL” GRADY HAMRICK, III  
Georgia State-wide Business Court Judge

*Wells Fargo Bank, N.A., et al. v. Achenbach, et al. (23-GSBC-0013)*  
*Order Granting Verified Application for*  
*Pro Hac Vice Admission of Jonathan P. Hersey*



*Copies to:*<sup>1</sup>

**Terry R. Weiss**

[trweiss@duanemorris.com](mailto:trweiss@duanemorris.com)

**Catherine G. Lucas**

[klucas@duanemorris.com](mailto:klucas@duanemorris.com)

DUANE MORRIS LLP

1075 Peachtree Street, N.E., Suite 1700

Atlanta, Georgia 30309-3929

Telephone: (404) 253-6912

**Jonathan P. Hersey** (admitted *pro hac vice*)

[jonathan.hersey@klgates.com](mailto:jonathan.hersey@klgates.com)

**Kennedy M. Myers** (admitted *pro hac vice*)

[kennedy.loenhorst@klgates.com](mailto:kennedy.loenhorst@klgates.com)

K&L GATES LLP

1 Park Plaza, Twelfth Floor

Irvine, California 92614

Telephone: (949) 253-0900

*Counsel for Plaintiffs*

*Wells Fargo Bank, N.A., et al. v. Achenbach, et al. (23-GSBC-0013)*

*Order Granting Verified Application for*

*Pro Hac Vice Admission of Jonathan P. Hersey*

---

<sup>1</sup> Plaintiffs are directed to serve a copy of this order on the named Defendants (or their counsel if formally represented in connection with this action) in accordance with Georgia law.